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(Febr. 13, 1925, Chap. 229, Sec. 1, 43 Stats. 938) which permits appeals from any Circuit Court of Appeals to this court, when the validity of a statute of any state is drawn in question on the ground of its being repugnant to the constitution, treaties, or laws of the United States.

The decree sought to be reviewed was handed down by the Circuit Court of Appeals, Eighth Circuit, on October 24, 1927 (Rec. p. 32), in pursuance of an opinion filed therein on October 10, 1927 (Rec. p. 21).

The application for appeal is not shown in the record for the reason that at the time the record was made up the rules did not provide therefor. The order allowing appeal does, however, appear (Rec. p. 33), showing the allowance thereof on January 5, 1928.

The appellees filed, in the District Court of the United States, for the District of Nebraska, their bill in equity (Rec. p. 1), claiming under a will which they alleged had been held to be a forgery by the Supreme Court of Nebraska. As a second count, they alleged that they were the sole heirs at law of one John O'Connor, who died on the 17th day of August, 1913, in Adams County, Nebraska, leaving a large amount of personal and real property. The third count was one asking that the title to the estate of John O'Connor, deceased, be quieted in appellees.

The State of Nebraska and this appellant were made parties, but the State of Nebraska claimed its immunity from suit and the bill as to it was dismissed, and is not now before this court.

This appellant filed a motion (Rec. p. 11) asking that the bill be dismissed for the reason, *inter alia*, that facts sufficient to constitute a cause of action are not stated in

the bill. All three counts of the bill were dismissed by the district court for the reason that the first count had been finally adjudicated by the state court, and the second and third counts because the laws of Nebraska vested the exclusive original jurisdiction of matters of probate and determination of heirship in the county courts of the state.

Upon appeal to the Circuit Court of Appeals, Eighth Circuit, the judgment of the district court was affirmed, except as to the second and third counts as to this appellant. As to those counts the judgment was reversed.

Both in the district Court and in the circuit court of appeals this appellant relied upon Section 1129, Compiled Statutes Nebraska 1922, which gives to the county courts of Nebraska exclusive jurisdiction in all matters of probate and administration, and Article 5, Section 16, Constitution of Nebraska, which gives to such courts original jurisdiction in such matters. These provisions, it was and is claimed, give exclusive jurisdiction of matters such as were involved, to the county courts of Nebraska, and hence the federal courts have no jurisdiction.

In the opinion of the circuit court of appeals, the issue was thus stated (Rec. p. 22):

> "The court sustained the motion to dismiss the bill on the ground that sole jurisdiction over the causes of action was in the state courts.
>
> "It is the claim of appellees that the county court of Nebraska has exclusive original jurisdiction in the matters of probate and administration, and that the right to determine the heirs of a deceased person is vested solely in that court.
>
> "That matters of the character presented by appellants are not within the ordinary equity jurisdiction of the federal courts."

SPECIFICATION OF ASSIGNED ERRORS INTENDED TO BE URGED.

1. The United States Circuit Court of Appeals, Eighth Circuit, erred in holding that Section 1129, Comp. Stat. Neb. 1922, which gives to the county courts of Nebraska exclusive jurisdiction in all matters of probate, and to determine and adjudicate heirship, is null, void and of no effect insofar as the federal authority and jurisdiction over such matters is concerned.

2. The United States Circuit Court of Appeals, Eighth Circuit, erred in holding that Section 1129, Compiled Statutes of Nebraska 1922, and Article V, Section 16, of the Constitution of Nebraska, which give to the county courts of Nebraska exclusive original jurisdiction in all matters of probate and administration, and to determine an adjudicated heirship, are null, void, and of no effect insofar as the federal authority and jurisdiction over such matters is concerned.

3. The United States Circuit Court of Appeals, Eighth Circuit, erred in holding that the federal courts have jurisdiction to determine questions of heirship not granted by law or custom to any court of general jurisdiction in the State of Nebraska.

ARGUMENT.

The general question is whether the courts of the United States have jurisdiction to determine heirship in an administration proceeding where, by the statutes and constitution of the state, original jurisdiction in such matters is vested exclusively in the county courts.

The district court, as heretofore shown, determined that question in the negative. The circuit court of appeals determined it in the affirmative, and the matter is now before this court for final determination.

Under Article V, Section 16, of the Constitution of Nebraska:

> "County courts shall be courts of record, and shall have original jurisdiction in all matters of probate, settlement of estates of deceased persons, and in such proceedings, to find and determine heirship. * * *"

Section 1129, Comp. Stat. Neb. 1922, provides, *inter alia*:

> "The county court shall have exclusive jurisdiction of the probate of wills, the administration of estates of deceased persons," etc.

Section 1292, Comp. Stat. Neb. 1922, provides:

> "When any person shall die intestate, being the inhabitant of this state, letters of administration of his estate shall be granted by the county court of the county of which he was an inhabitant or resident at the time of his death. * * *"

Section 1439, Comp. Stat. Neb. 1922, provides:

> "After the payment of the debts, funeral charges and the expenses of administration * * * the county court shall, by a decree for that purpose, assign the residue of the estate, if any, to such other persons as are by law entitled to the same."

The Supreme Court of Nebraska has repeatedly held that the county court, under the provisions above quoted, has the sole, exclusive, original jurisdiction with reference to all matters of probate and administration and distribution of the estate of deceased persons.

Loosemore v. *Smith*, 12 Neb. 343.
In re Keller's Estate, 101 Neb. 115.
Pinn v. *Pinn*, 108 Neb. 822.
In re O'Connor's Estate, 114 Neb. 266.
Fitzgerald v. *Fitzgerald*, 48 Neb. 386.

Boales v. *Ferguson*, 55 Neb. 565.
Genau v. *Roderick*, 4 Neb. (Unof.) 436.
Williams v. *Miles*, 63 Neb. 859.
Kirk v. *Bowling*, 20 Neb. 260.
Stevenson v. *Valentine*, 38 Neb. 902.
State v. *O'Connor*, 102 Neb. 187.

In the case last above cited, it was held:

"The county court has exclusive original jurisdiction in matters of probate and in the settlement and distribution of the estates of deceased persons.

"The district court has no jurisdiction to decide between the conflicting claims of persons alleging they are heirs to the lands of the deceased, and, pending administration proceedings and a decree of heirship in the county court, an action on the part of the state to quiet title to the same, which it asserts by virtue of escheat for want of heirs, should be abated until determination of the question of heirship in that court."

In the opinion the court said:

"When John O'Connor died, if he had no heirs, his real estate at once escheated to the state without the aid of legal proceedings, and the state has a right in such event to bring an action to quiet its title. But there are many persons claiming to be his heirs, adversely to the state, and adversely to each other. In order to determine the main issue, viz., whether any heirs of John O'Connor in fact exist, the district court would be required to examine the evidence of heirship proffered by each of the claimants and to decide in the first place whether any of them were heirs of the deceased. This is an action which by the Constitution and the law is committed originally exclusively to the county court. The district court may, no doubt, in a controversy with respect to the title of land, arising between one who is the undisputed

> heir of a deceased person, and another person claiming a title through another source, quiet the title of the heir (citing cases). But, in a case between rival heirs where the determination of descent depends upon the question of heirship, the district court cannot make a final adjudication until that question has been settled by the county court."

If the statutes above set out are of any validity, as far as the courts of the United States are concerned, then clearly these courts have no jurisdiction of controversies, the sole aim and end of which is the determination of heirship. It is only by holding those statutory and constitutional provisions invalid, so far as the federal jurisdiction is concerned, that such jurisdiction can be maintained.

The appellant is not unmindful that in a number of cases, decided by this court, it was broadly stated that the federal courts had jurisdiction in such a matter.

In the case of *Payne* v. *Hook*, 74 U. S. (7 Wall.) 425, it was stated that:

> "The jurisdiction of the Circuit Court of the United States, in a case for equitable relief, was not excluded because, by the laws of the State, the matter was within the exclusive jurisdiction of its probate courts."

That case, however, is the only one, so far as this appellant has been able to find, in which that question was actually involved, and, as shall hereinafter be shown, this case must be regarded as having been limited by the more recent decisions of this court.

The Constitution and statutes of Nebraska giving the county court exclusive original jurisdiction of administration matters is a limitation and condition upon the right of inheritance. It other words, the law provides that in

the absence of a will, certain relatives may inherit the estate of a deceased person, but to that grant of inheritance it affixed the condition that the county court should have exclusive original jurisdiction to determine the relationship and the right of those claiming the property.

It is well established that rights of inheritance are purely statutory creations, which the state may limit, qualify or deny altogether.

Blackstone thus discusses the subject:

> "The most universal and effectual way of abandoning property is by the death of the occupant; when, both the actual possession and intention of keeping possession ceases, the property which is founded upon such possession and intention ought also to cease of course. For, naturally speaking, the instant a man ceases to be he ceases to have any dominion; else if he had a right to dispose of his acquisitions one moment beyond his life, he would also have a right to direct their disposal for a million of ages after him; which would be highly absurd and inconvenient. All property must therefore cease upon death, considering men as absolute individuals and unconnected with civil society. * * * The right of inheritance or descent to the children and relations of the deceased seems to have been allowed much earlier than the right of devising by testament. We are apt to conceive, at first view, that it has nature on its side; yet we often mistake for nature what we find established by long and inveterate custom. It is certainly a wise and effectual, but clearly a political establishment. * * * Wills, therefore, and testaments, rights of inheritance and successions, all of them creatures of the civil or municipal laws, and accordingly are in all respects regulated by them."
>
> 2 Bl. Comm. 10, 11, 12.

Dawson v. Godfrey, 4 Cranch, 321, 2 L. Ed. 634, was a case in which a person born in England brought an action in the Circuit Court for the District of Columbia, claiming the estate of one Lee, who died a citizen and resident of Maryland. Under the law of Maryland, an alien was prohibited from inheriting. In holding that plaintiff had no common law right to inherit, and affirming the judgment for defendant, the court said:

> "Much of the difficulty in satisfying the mind on this subject vanishes upon a full view of the nature of the right of inheritance. Gentlemen have argued upon it as if it were a natural and perfect right; whereas it has its origin in, and is modified to infinity by the laws of society, in exercise of the right of territorial jurisdiction. To be entitled to inherit in the state of Maryland, a right should be made out *under the laws of that state*."

In *United States v. Fox*, 94 U. S. 315, 24 L. Ed. 192, the court said:

> "The power of the state to regulate the tenure of real property within her limits, and the modes of acquisition and transfer, and the rules of its descent, and the extent to which a testamentary disposition of it may be exercised by its owners, is undoubted. It is an established principle of law, everywhere recognized, arising from the necessity of the case, that the disposition of immovable property, whether by death, *descent or any other mode*, is exclusively subject to the government within whose jurisdiction the property is situated. *M'Cormick v. Sullivan*, 10 Wheat. 202. The power of the state in this regard follows from her sovereignty within her limits, as to all matters which jurisdiction has not been expressly or by necessary implication transferred to the Federal government. The descent and modes of distribution of real property within the state, whether *inter vivos* or testamentary, are not matters placed under the control

> of Federal authority. Such control would be foreign to the purposes for which the Federal government was created, and would seriously embarrass the landed interests of the state. * * *
>
> "Every person must, therefore, devise his lands in that state within the limitations of the statute or he cannot devise them at all. His power is bounded by these conditions."

In that case the court held that the United States was not entitled to a devise made to it where the state law was opposed to any such power to devise.

In *Magoun v. Grima*, 49 U. S. (8 How.) 490, 493, 12 L. Ed. 1168, 1170, it was said:

> "Now, the law in question is nothing more than an exercise of the power which every state and sovereignty possesses, of regulating the manner and term upon which property, real or personal, within its dominion, may be transmitted by last will and testament, or by inheritance; *and of prescribing who shall and who shall not be capable of taking it.* Every state or nation may unquestionably refuse to allow an alien to take either real or personal property situated within its limits, either as heir or legatee, and may, if it thinks proper, direct that property so descending or bequeathed, shall belong to it. In many of the states of this union, at this day, real property devised to an alien is liable to escheat, and if a state may deny the privilege altogether, it follows that, when it grants it, *it may annex to the grant any conditions which it supposes to be required by its interests or policy.*"

In *Magoun v. Illinois Trust, etc., Bank*, 170 U. S. 283, 288, 18 S. C. R. 594, 42 L. Ed. 1037, 1041, the supreme court said, in sustaining an inheritance tax, and after citing a number of cases:

> "It is not necessary to review these cases or state at length the reasoning by which they are supported

They are based on two principles: 1, an inheritance tax is not one on property but one on the succession. 2. The right to take property by devise or descent is the creature of the law, and not a natural right—a privilege, and therefore *the authority which confers it may impose conditions upon it.* From these principles it is deduced that the states may tax the privilege, discriminating between relatives, and between these and strangers, and grant exemptions, and are not precluded from this power by the respective state constitutions requiring uniformity and equality of taxation."

In *Campbell v. California*, 200 U. S. 87, 94, 26 S. C. 182, 50 L. Ed. 382, 387, the Supreme Court of the United States sustained an inheritance tax of California which subjected to such taxation brothers and sisters of a decedent and did not subject strangers to the blood, such as the wife, or widow of a son, or the husband of a daughter of a decedent. The court mentions that the law is sought to be held invalid under the Fourteenth Amendment, saying:

"That is to say, in their last analysis all the arguments depend upon the proposition that the Fourteenth Amendment has taken away from the states their power *to regulate the passage of property by death, or the burdens which may be imposed resulting therefrom*, because that amendment confines the states absolutely, both as to the passage of such property and as to the burdens imposed thereon, to the rule of blood relationship. Its unsoundness is demonstrated by previous decisions of this court. *Magoun v. Illinois Trust & Sav. Bank*, 170 U. S. 283, 42 L. Ed. 1037, 18 S. C. R. 594; *Orient Ins. Co. v. Daggs*, 172 U. S. 557, 562, 43 L. Ed. 552, 554, 19 S. C. R. 281. It is true that in the first of the cited cases it was expressly declared or impliedly recognized that in the exercise by a state of its undoubted power to regulate the burdens which might be imposed on the

> passage of property by death, a case might be conceived of where a burden would be so arbitrary as to amount to a denial of the equal protection of the laws. But this suggestion did not imply that the effect of the 14th Amendment was to control the states in the exercise of their plenary authority to regulate inheritances and to determine the persons or objects upon which an inheritance burden should be imposed. In this case there can be no doubt, if the right of a state be conceded to select the persons who may inherit, or upon whom the burden resulting from an inheritance may be imposed, the complaint against the statute is entirely without merit. The whole case therefore must rest upon the assumption that because the state of California has not followed the rule of blood relationship, but, as to particular classes, has applied the rule of affinity by marriage, therefore the constitutional provision guaranteeing the equal protection of the laws was violated."

The court continues and holds that the Fourteenth Amendment does not apply to any regulation on the part of the state inheritances or testamentary dispositions, and continues:

> "If this were not true, state legislation preferring a wife in the distribution of the estate of her husband to a brother or sister of the husband would be void as repugnant to the 14th Amendment. So also would be the provision in the California statute we are considering, preferring an adopted child of a decedent to a brother or sister. With the motives of public policy which may induce a state to prefer near relatives by affinity to collateral relatives, we are not concerned, since the 14th Amendment does not deprive a state of the power to regulate and burden the right to inherit."

In the most recent expression of our supreme court, *Stebbins* v. *Riley*, 268 U. S. 137, 140, 69 L. Ed. 884, 887, the court used this language in sustaining a California in-

heritance tax which required that there should be no deduction of the federal tax in fixing the value of the legacies, etc.:

> "There is much in judicial opinion to suggest that a state may impose any condition it chooses on the privilege of taking property by will or descent, or, indeed, that it may abolish that privilege altogether; and, for this reason, that a state is untrammeled in its power to tax the privilege" (citing cases).

In *Sunderland* v. *United States*, 266 U. S. 226, 69 L. Ed. 259, it was said:

> "The general rule is not to be doubted that the tenure, transfer, control and disposition of real property are matters which rest exclusively with the state where the property lies."

Many other decisions of the supreme court might be cited, some of which are:

Black v. *Miller*, 188 U. S. 204, 47 L. Ed. 444.
Snyder v. *Bettman*, 190 U. S. 251, 49 L. Ed. 1036.
Cohen v. *Brewster*, 203 U. S. 550, 51 L. Ed. 313.
Keeney v. *Controller*, 222 U. S. 534, 38 L. R. A. (N. S.) 1139, 56 L. Ed. 305.
National Safe Deposit Co. v. *Stead*, 232 U. S. 58, 58 L. Ed. 505.
Plummer v. *Coler*, 178 U. S. 133, 44 L. Ed. 1007.

The doctrine that the right to inherit is not a natural one, but is a mere creature and gift of the law, has obtained for centuries. In only one jurisdiction has this proposition ever been denied.

In the case of *Nunnemacher* v. *State*, 129 Wis. 190, 108 N. W. 627, 9 L. R. A. (N. S.) 121, 9 Ann. Cas. 711, it was held that the right to inherit was a natural right. This case has never had any following except in the

state of Wisconsin. With reference to that case, it is said by the author in the note to 9 Ann. Cas. 727:

> "The doctrine of the reported case, that there is a natural right produced by the constitution, to take property by inheritance, devise or bequeath, is entirely new to the law. The doctrine which has long been regarded as not open to question is that such right is entirely dependent upon, and subject to, modification or abridgement by statutory law."

The author then discusses cases announcing the contrary doctrine, and continues:

> "If, as is decided in the reported case, the right to inherit or to take by testamentary disposition is a natural right not 'defeasible by legislation,' it may be asked, in what heir, or class of heirs does this right inhere? Can it be said to belong either to the wife of a decedent, or to his children, or to his collateral relations, beyond the power of a legislature to impair it? Upon this question the supreme court of Illinois has well said: 'The statute today provides that where a person dies intestate, seized of lands, the same shall descend to his children in equal parts. Suppose that A has one thousand acres of land, and five children, under the statute, should he now die, the lands would descend in equal parts to all the children. But the legislature has the power to provide at its next session that the fee of these lands shall descent to the wife of A, and thus deprive the children of any right that they may now have in expectancy to these lands. The right of dower which a wife may have in the estate of the husband before his death is one which may be changed in such manner as the legislature may think for the best interests of the people. It may be entirely abolished or it may be enlarged."

The author discusses more authorities, and continues:

> "The constitutionality of statutes imposing a tax on successions to estates is usually the question direct

ly involved in the decisions which have declared that the right to take property by inheritance or devise is not a natural right protected by constitutional guaranty. In sustaining the validity of such taxation the courts mention, and in part base their decisions upon, the principle that the right to take property by devise or descent is merely a creature of enacted law, and may be abridged or taken away by the same authority which has conferred it. It is true that in these cases the courts might have upheld the statutes before them without deciding or assuming that there is no constitutional right to inherit property or take it by will, and that to this extent the utterances of the courts on the proposition might be considered to be dicta, but these utterances have been repeated so often that they cannot well be regarded as other than judicial declarations of the law."

The author of the note to the Nunnemacher case in 9 L. R. A. (N. S.) 121, uses even more forceful language. It is therein said:

> "The proposition enunciated by the Wisconsin court, that the right to take property by will or inheritance is a natural right, seems to be entirely opposed to the whole course of legal doctrine. Not a single other authority can be found to support it, and it is opposed to the views of all historians of law, and of all economic writers. Indeed, the entire body of the law of descent and distribution seems to have been built upon the opposite conclusion. For example, in the absence of an enabling statute, neither aliens nor bastards can inherit property. As a matter of fact, the cases which uphold the proposition that the right to take property by will or inheritance is purely the creature of municipal law are so numerous that no attempt is here made to collate them all."

In view of the authorities heretofore discussed it must be accepted as definitely established that the state has the exclusive right to give, regulate and control the right

to inherit or receive by will. This being true, the state may deny that privilege altogether, or it may give it to such persons or classes of persons as it may see fit. As has been suggested, in some of the cases above, statutes are common which either altogether or in part deny or limit the right of persons who, under the theory of natural inheritance, would be entitled to inherit. Bastards, for instance, are in all respects as much blood relatives as legitimate children, yet in most jurisdictions a bastard is not entitled to inherit property except under certain specific conditions. The husband or wife of a decedent is ordinarily no blood relative, yet in a great many, if not most, states, such surviving spouse is entitled to inherit with, and in many cases, to the exclusion of blood relatives. If the state therefore can deprive relatives of the right to inherit entirely, it necessarily follows that it may qualify or limit such right and make such regulation as it may see fit. With the propriety or policy of such regulations, as the supreme court in one of the preceding cases said, the courts have no concern.

These things being true, as it is believed they are, is it not equally true that a state may provide that certain people or classes of people, shall be entitled to inherit, provided that they comply with certain requirements and regulations? More concretely, where a state gives the right to inherit, and gives a certain court the exclusive original jurisdiction to determine whether the particular persons in question were thus entitled to inherit, is this not a reasonable regulation which the donor may impose upon the gratuity given?

If a state has the right, as the cases heretofore referred to clearly show, to impose a tax upon an inheritance, why has it not the right to provide that those claiming an inheritance must prove their right thereto in a certain

court? There does not seem to be any essential distinction between such cases. In both, the state simply places a qualification or limitation upon the gratuity which it is giving away. Why then should the federal courts insist that they have the jurisdiction to determine to whom the gift of inheritance should belong where the state which made the gift has expressly provided that such right shall be determined in the county court?

It is not alone the fact of relationship that authorizes inheritance, but the fact that it is provided in a certain prescribed way. The prescribed way of proving the relationship is a condition precedent to any right of inheritance. How then does it lie in the mouth of one to say that he has a right to inherit, or is entitled to an estate, when at the same time he refuses to comply with the conditions upon which that right depends?

In view of the authorities heretofore mentioned, the conclusion, it is believed, is irresistible, that the right to inherit in Nebraska is conditioned upon the finding and adjudication of that fact in the county court, and especially is this true in the case of a contest as to the heirship. The cases relied upon to the contrary are cases in which it appears that there was no contest with reference to the heirship, in which it was admitted, or at least taken for granted, that the plaintiff was actually an heir.

The more recent decisions of this court tend to sustain the contention of this appellant. Thus, in *Farrell* v. *O'Brien*, 199 U. S. 89, the right of the state, as herein contended for, seems to have been recognized. The court therein quotes the following from another opinion (p. 107):

> "The original probate (of wills) of course is a mere matter of state regulation, and depends entirely upon the local law; for it is that law which confers

> the power of making wills, and prescribes the conditions upon which alone they may take effect, and as by the law in almost all the states, no instrument can be effective as a will until proved, no rights in relation to, capable of being contested between parties can arise until preliminary probate has first been made."

Likewise, in the instant case, the law of descent and distribution is a mere matter of state regulation and depends purely upon the laws of Nebraska, for, to paraphrase the language above, "it is that law which confers the power of receiving by inheritance and prescribes the conditions upon which alone it may take effect, and as, by the law of Nebraska, no inheritance rights can be effective until established as required, no rights in relation to such estate, capable of being contested between parties, can arise until such steps have been taken."

In the later case of *Sutton v. English*, 246 U. S. 199, it was said that:

> "A suit which, in an essential feature, is one to annul a will, and one which, therefore, under the local law, is merely supplementary to the probate proceedings and cognizable only by the probate court, is not within the equity jurisdiction of the federal courts."

It is evident from the above that more and more the court recognizes that where certain rights are creatures of the statute, conditions and limitations upon such right, being in their nature conditions precedent to the gratuity of the state, will be respected.

In the Sutton case it was said (p. 203):

> "By a series of decisions in this court, it has been established that since it does not pertain to the general jurisdiction of a court of equity to set aside a will or the probate thereof, *or to administer upon*

the estates of decedents in rem, matters of this character are not within the ordinary equity jurisdiction of the Federal courts; that as the authority to make wills is derived from the states, and the requirement of probate is but a regulation to make a will effective, matters of strict probate are not within the jurisdiction of courts of the United States; that where a state, by statute, or custom, gives to parties interested the right to bring an action or suit *inter parties* either at law or in equity to annul a will or to set aside the probate, the courts of the United States, where diversity of citizenship and a sufficient amount in controversy appear, can enforce the same remedy, *but that this relates only to independent suits, and not to procedure merely incidental or ancillary to the probate;* and further, that questions relating to the interests of heirs, devisees, or legatees, or trusts affecting such interests, which may be determined without interfering with probate, or assuming general administration, are within the jurisdiction of the Federal courts where diversity of citizenship exists and the requisite amount is in controversy."

The statutes of Nebraska, giving the county court exclusive jurisdiction in matters of probate and administration of estates, is a condition precedent to the right to inherit, and should be respected as such. The district court, it is believed, was right in so holding.

The judgment of the Circuit Court of Appeals, Eighth Circuit, in holding that the federal court had jurisdiction as to the second and third count of the bill, should be reversed and the judgment of the district court affirmed.

Respectfully submitted,

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